

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

COUNTY OF KERN
SHAFTER-WASCO SANITARY LANDFILL

FINAL ENGINEERING EVALUATION

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MSWL (EG) APPLICATION REVIEW

Project #: 1010475	
Deemed Complete: May 24, 2001	
Engineer: Douglas Shaffer	
Date: June 4, 2002	
Facility Number:	S-3431
Facility Name:	Kern County Waste Management—Shafter-Wasco Sanitary Landfill
Mailing Address:	2700 "M" Street, Suite 500
	Bakersfield, CA 93301
Contact Name:	Tim Reed
Phone:	(661) 862 8855
Responsible Official:	Daphne Washington
Title:	Director, Waste Management

I. PROPOSAL

The [County of Kern](#) is proposing that an Initial Title V permit be issued for its [Shafter-Wasco Sanitary Landfill](#) facility in the [County of Kern](#). The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

[Shafter-Wasco Sanitary Landfill](#) is located at [17621 Scofield Ave](#), near Shafter, CA.

III. EQUIPMENT LISTING

A detailed facility printout is provided in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is not requesting to use of any model general permit Templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant has not requested to utilize any model general permit templates. Therefore, the proposed permit in its entirety is subject to EPA and public review.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY PERMIT TEMPLATES

The applicant has not proposed to utilize any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of general permit templates.

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY PERMIT TEMPLATES

District Rule 1100 Equipment Breakdown (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 111)

District Rule 1160 Emission Statements (Adopted November 18, 1992)

District Rule 2010 Permits Required (Amended December 17, 1992)

District Rule 2020 Exemptions (Amended July 21, 1994) (Non SIP replacement for Kern County Rule 202)

District Rule 2031 Transfer of Permits (Amended December 17, 1992)

District Rule 2040 Applications (Amended December 17, 1992)

District Rule 2070 Standards for Granting Applications (Amended December 17, 1992)

District Rule 2080 Conditional Approval (Amended December 17, 1992)

District Rule 2520 Federally Mandated Operating Permits (Amended June 21, 2001), Sections 5.2, 9.3.1, 9.3.2, 9.4.1, 9.4.2, 9.5.1, 9.5.2, 9.7, 9.8.2, 9.8.3, 9.8.4, 9.8.5, 9.9, 9.12, 9.13.1, 9.13.2, 9.14, 9.16 and 10.0

District Rule 4101 Visible Emissions (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 401)

District Rule 4601 Architectural Coatings (Amended December 17, 1992)

District Rule 8020 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Construction, Demolition, Excavation, and Extraction Activities (Amended April 25, 1996)

District Rule 8030 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Handling and Storage of Bulk Materials (Amended April 25, 1996)

District Rule 8040 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Landfill Disposal Sites (Amended April 25, 1996)

District Rule 8060 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Paved and Unpaved Roads (Amended April 25, 1996)

District Rule 8070 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Vehicle and/or Equipment Parking, Shipping, Receiving, Transfer, Fueling, and Service Areas (Amended April 25, 1996)

40 CFR Part 60 Subpart Cc Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills...

40 CFR Part 60 Subpart WWW Standards of Performance for Municipal Solid Waste Landfills

40 CFR Part 61 Subpart M National Emission Standard for Asbestos

40 CFR Part 62 Subpart GGG Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction Prior to May 30, 1991 and Have Not Been Modified or Reconstructed Since May 30, 1991

40 CFR Part 82 Subpart F Stratospheric Ozone

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Federally Enforceable requirements. The terms and conditions that are part of the facility's Federally Enforceable requirements will be, upon approval into the state plan and administrative conversion, designated as "Federally Enforceable Through Title V Permit."

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102 Nuisance (Amended December 17, 1992)

For this facility the following conditions are based on the rules listed above and are not Federally Enforceable through Title V: condition 40 of the facility wide requirements.

IX. COMPLIANCE

A. Requirements Not Addressed by General Permit Templates

1. District Rule 1100 Equipment Breakdown (Non SIP replacement for Kern County Rule 111)

District Rule 1100 has been submitted to the EPA to replace Kern County Rule 111 in the SIP. District Rule 1100 is at least as stringent as the county SIP rule addressing breakdowns, as demonstrated in Table 1.

Table 1 - Comparison of District Rule 1100 to Kern County Rule 111

REQUIREMENTS	District Rule 1100	Kern Rule 111
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	X	X
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	X	X
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	X	X
1) A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	X	X
2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	X	X
3) A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	X	
4) Pictures of the equipment or controls which failed if available.	X	

Sections 6.0 and 7.0 set forth breakdown procedures and reporting requirements. These requirements are addressed by facility wide permit conditions 1, 2 and 11.

2. District Rule 1160 Emission Statements

Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emission statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. [The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the Air Resources Board \(ARB\) with an emission inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB.](#) See facility wide permit condition 3.

3. District Rules 2010 Permits Required and 2020 Exemptions (Non SIP replacement for Kern County Rule 202)

District Rule 2010 sections 3.0 and 4.0 require any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted. These requirements are stated in facility wide permit condition 4.

District Rule 2020 has been submitted to the EPA to replace each of the county rules in the SIP: rule 202 (in all eight counties in the San Joaquin Valley). District Rule 2020 lists equipment that is specifically exempt from obtaining permits and specifies record keeping requirements to verify such exemptions. These requirements are stated in facility wide permit condition 4.

District Rule 2020 is at least as stringent as the corresponding county SIP rule, as demonstrated in Table 2.

Table 2 - Comparison of District Rule 2020 to Kern County Rule 202

REQUIREMENTS	District Rule 2020	Kern Rule 202
An ATC or PTO is not required for listed exempt equipment.	X	X
Conditions are stated under which listed exempt equipment will require an ATC or PTO.	X	
Record keeping is required to verify and maintain exemption, when the exemption is based on a maximum daily limitation.	X	
A compliance schedule is stated for equipment that loses exemption from permitting, necessitating submission of a PTO application.	X	

4. District Rules 2031 Transfer of Permits, 2070 Standards for Granting Applications and 2080 Conditional Approval

These rules set forth requirements to comply with all conditions of the Permit to Operate. Permits to Operate or Authorities to Construct are not transferable unless a new application is filed with and approved by the District. All source operations must be constructed and operated as specified in the Authority to Construct. See [facility wide](#) permit conditions 5 and 6.

5. District Rule 2040 Applications

Section 3.0 requires that every application for a permit shall be filed in a manner and form prescribed by the District. See [facility wide](#) permit condition 7.

6. District Rule 2520 Federally Mandated Operating Permits

Section 5.2 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration. [Facility wide](#) permit condition 38 assures compliance with this requirement.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

Section 9.3 contains requirements for monitoring emissions. The permit shall include all analysis procedures or test methods by reference, periodic monitoring to provide reliable data (including record keeping), and requirements for installation, use and maintenance of monitoring equipment (as appropriate). These monitoring requirements are required of permit [unit -1](#) in permit condition 15.

Sections 9.4.1 and 9.4.2 contains requirements to incorporate all applicable record keeping requirements into the Title V permit, specific records of any required monitoring, and the retention of all required monitoring data and support information for five years. The requirements to keep specific monitoring records and retain records for five years are stated in [facility wide](#) permit conditions 8 and 9, respectively. Record keeping is also required of permit [unit -1](#) in permit condition 15.

Section 9.5 contains requirements for the submittal of reports of monitoring at least every six months and prompt reporting of deviations from permitting requirements, including those attributable to upset conditions. All required reports must be certified by the responsible official. These requirements are stated in [facility wide](#) permit conditions 10 and 11. Condition 41 of the [facility wide](#) requirements indicates the issuance date, which signifies the beginning and anniversary of all reporting periods.

Section 9.7 states that the Title V permit must also contain a severability clause in case of a court challenge; the severability clause is stated in [facility wide](#) permit condition 12.

Section 9.8 contains requirements for provisions in the Title V permit stating that 1) the permittee must comply with all permit conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Title V permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit. Compliance with these sections of Rule 2520 is assured by [facility wide](#) permit conditions 5 and 13 through 16.

Section 9.9 contains the requirement to provide in the permit that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120. This requirement is stated in [facility wide](#) permit condition 17.

Section 9.13.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA shall contain a certification by a responsible official to truth, accuracy, and completeness. Compliance with this section is assured by [facility wide](#) permit condition 28.

Section 9.13.2 contains inspection and entry requirements that allow an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements. Compliance with this section is assured by [facility wide](#) permit conditions 18, 19, 20 and 21.

Section 9.16 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District). [Facility wide](#) permit condition 37 assures compliance with this requirement.

Section 10.0 requires any application form, report or compliance certification submitted pursuant to these regulations shall contain certification of truth accuracy, and completeness by a responsible official. Compliance with this section will be assured by [facility wide](#) permit condition 28.

7. District Rule 4002 National Emissions Standard for Hazardous Air Pollutants

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures. Compliance is assured for these requirements by [facility wide](#) permit condition 36.

8. District Rule 4101 Visible Emissions (Non SIP replacement for Kern County Rule 401)

District Rule 4101 has been submitted to the EPA to replace Rule 401 (all counties of the SJVUAPCD). EPA made a preliminary determination that District Rule 4101 is “more stringent” than the county versions previously referenced, per correspondence date August 20, 1996.

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer’s view to a degree equal to or greater than 20% opacity. This requirement is stated in [facility wide](#) permit condition 22.

9. District Rule 4601 Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of coating to no more than 250 grams of VOC/liter of coating (less water and exempt compounds). It also forbids the use of coating from the list in the Table of Standards (section 5.2) and limits the use of Specialty Coatings to a VOC content not to exceed the specified limits in Table 1 of Rule 4601. This rule further specifies labeling requirements, coatings thinning recommendations, storage requirements and cleanup requirements. Compliance is assured by [facility wide](#) permit conditions 23, 24, 25, 26 and 27.

10. 40 CFR Part 60 Subpart Cc Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills

[Subpart Cc, Emission Guidelines, applies to this facility. However, the District does not have delegation of this Subpart. This facility is therefore subject to 40 CFR 62 Subpart GGG Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction Prior to May 30, 1991 and Have Not Been Modified or Reconstructed Since May 30, 1991.](#)

11. 40 CFR Part 60 Subpart WWW Standards of Performance for Municipal Solid Waste Landfills

Subpart WWW contains requirements applicable to existing MSWL, as referenced by 40 CFR 62, Subpart GGG. Compliance with these requirements is addressed as follows:

Section 60.752(a) and (b) contain requirements for submittal of initial and subsequent design capacity and NMOC emission reports. Conditions addressing submittal of the initial design capacity and initial NMOC emission rate reports to the APCO are not included in this evaluation. These requirements are extraneous, since landfills are required to submit these reports to the APCO, with their permit application for the landfill. The submittal of amended design capacity reports is not required for this source since they have design capacities above the limits of 2.5 million megagrams and 2.5 million cubic meters prior to any modification. Only landfills that undergo a modification to increase the design capacity above the 2.5 million megagrams and 2.5 million cubic meters limits will become subject to the NSPS for landfills, 40 CFR 60 Subpart WWW. Compliance with subsequent NMOC emission report submittal is assured by conditions 9 and 16 through 18 of the requirements for permit [unit -1](#) and is also required pursuant to sections 60.754(a) and 60.757(b).

Sections 60.753, 60.755 and 60.756 address operational standards, compliance provisions and monitoring of installed collection and control systems. These system specific requirements will become applicable once a gas collection and control system, pursuant to Part 62 Subpart GGG, is installed. Compliance is assured through conditions 18 and 19 for permit [unit -1](#).

Sections 60.754(a) and (c) contain test methods and procedures for calculating NMOC emission rates. Compliance is assured by permit conditions 1 through 9 for permit [unit -1](#).

Sections 60.754(b) and (d) contain requirements applicable to a MSWL after the installation of a collection and control system. Compliance with these requirements is assured by permit conditions 18 and 19 for permit [unit -1](#).

Section 60.757(a) addresses initial and subsequent design capacity report submittal. As already mentioned under 60.752(a) and (b), this section is not applicable to this source.

Sections 60.757(b), (c) and (d) address reporting requirements for NMOC emission rates and landfill closure reports. Compliance with these sections is assured by permit conditions 9 through 14 and 17 for permit [unit -1](#).

Sections 60.757(e), (f) and (g) address reporting requirements for controlled landfills. Compliance with these requirements is assured by permit conditions 18 and 19 for permit [unit -1](#).

Section 60.758, except section 60.758(a), contains record keeping requirements for a MSWL with collection and control system devices. Compliance with these requirements is assured by permit conditions 18 and 19 for permit [unit -1](#).

Section 60.758(a) addresses record keeping requirements for design capacity, solid waste in-place and waste acceptance rate. Compliance is assured by permit condition 15 for permit [unit -1](#).

Section 60.759 contains specifications for MSWL gas active collection systems. Compliance with any potential applicability of these requirements is assured by permit conditions 18 and 19 for permit [unit -1](#).

12. 40 CFR Part 62 Subpart GGG Federal Plan Requirements for Municipal Solid Waste Landfills...

This Subpart requires sources with capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters to perform periodic calculations and submit periodic reports, and comply with specific increments of progress when applicable. Should the nonmethane organic compounds (NMOC) emission rate exceed 50 megagrams/year at an affected facility, the landfill is required to design and install a collection and control system, according to design plan submittal. Compliance with the requirements of this Subpart is addressed in the following manner:

Section 62.14352(e) requires affected MSWLs with design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters to be permitted under Title V. Compliance has been demonstrated by the facility's timely application submittal.

Section 62.14352(f) states that when MSWL is closed, the owner or operator is no longer subject to the requirement to maintain the Title V permit if either of the following conditions are met: 1) the landfill was never subject to the requirement to have a control system, pursuant to §62.14353 or 2) the owner or operator meet the conditions for control system removal, pursuant to §60.752(b)(2)(v). Permit conditions 16 and 17 for permit [unit -1](#) assure compliance with this requirement.

Section 62.14353 requires collection and control systems meet certain design requirements. Permit conditions 17, 18, and 19 for permit [unit -1](#) assure compliance with these requirements.

Section 62.14354(a) states that the NMOC emission rate be calculated using the values and procedures in 40 CFR 60.754 to determine if emissions equal or exceed 50 megagrams/yr. Refer to the compliance discussion under Subpart WWW for compliance with these requirements.

Section 62.14354(b) states that a collection and control system must meet the operational standards in 40 CFR 60.753; a controlled landfill must meet the compliance provision in 40 CFR 60.755 and the monitoring provision in 40 CFR 60.756. Permit conditions 18 and 19 for permit [unit -1](#) assure compliance with these requirements. Once the collection and control system is installed at affected facilities, compliance with system specific requirements will be addressed through modification of the permit.

Section 62.14355 states that record keeping and reporting provisions in sections 60.757 and 60.758 shall be followed. Refer to the compliance discussion under Subpart WWW for compliance with these requirements. This section also requires reporting for each increment of progress and is addressed by permit condition 20 of permit [unit -1](#).

Sections 62.14356 address compliance times and increments of progress for installation of a collection and control system at a MSWL whose emissions have exceeded 50 megagrams/yr. Compliance with this section is assured by permit conditions 21 through 26 for permit [unit -1](#).

13. 40 CFR Part 82 Subpart F Stratospheric Ozone

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). Compliance is assured for these requirements by [facility wide](#) permit conditions 29 and 30.

14. SJVUAPCD Regulation VIII (District Rules 8020, 8030, 8040, 8060 and 8070) - Fugitive Dust (PM₁₀)

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources: construction (including road construction), demolition, excavation, extraction, and water mining activities; outdoor storage piles; paved and unpaved roads; and landfill disposal sites. Compliance with these regulations is assured by [facility wide](#) permit conditions 31 through 35, formerly on the permit to operate for [unit -1](#).

X. PERMIT CONDITIONS

See permit conditions on the following pages.

Attachment A

Detailed Facility Printout

Attachment B

Insignificant Activities

Title V Application - INSIGNIFICANT ACTIVITIES

COMPANY NAME:	County of Kern, Shafter-Wasco Sanitary Landfill	FACILITY ID:	S-3431		
Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.					
Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	√
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1		Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Piston-type i.c. engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2	√	Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251	6.7.1.1	
Space heating equipment other than boilers	6.1.4	√	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2		Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	√
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	√
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		Brazing, soldering, or welding equipment	6.10	√
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	
Containers used to store clean produced water	6.6.1	√	Fugitive emissions sources assoc. with exempt equipment	6.12	
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2	√	Pits and Ponds as defined in Rule 1020	6.15	√
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 150 F	6.6.4	√	Emissions less than 2 lb/day from units not included above	6.19	√
Containers used to store unheated organic material with an initial boiling point ≥ 302 F*	6.6.5	√	Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	√
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7	√	Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

☐ No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

Attachment C

Current Permits

Attachment D

EPA Comments / District Response

EPA COMMENTS / DISTRICT RESPONSE

The following EPA comments were received regarding the proposed Title V Operating Permit for Shafter-Wasco Sanitary Landfill (District facility S-3431). These comments are encapsulated below followed by the District's response. A copy of the EPA 05/13/02 comment letter is available at the District.

Shafter-Wasco Sanitary Landfill

Status: Tier 2 calculations show NMOC < 50 Mg/yr.

Suggestions:

Add the following language to permit unit requirement #3:

"...For sampling, at least 2 sample probes shall be installed per hectare of landfill surface that has retained waste for at least 2 years, up to a maximum of 50 required probes. The sample probes should be located to avoid known areas of nondegradable solid waste. One sample of landfill gas shall be collected from each probe..."

District Response:

The district will modify condition 3 to read as follows:

Tier 2 specifications to determine the site-specific NMOC concentration shall include the following: 1) For sampling, at least 2 sample probes shall be installed per hectare of landfill surface that has retained waste for at least 2 years, up to a maximum of 50 required probes. Probes should be located in known areas of degradable solid waste. One sample of landfill gas shall be collected from each probe to determine the NMOC concentration, using EPA Method 25, 25C, another method approved by the EPA, or 18, in accordance with 40 CFR 60.754(a)(3). If EPA Method 18 is used, the minimum list of compounds to be tested shall be those published in the most recent Compilation of AP-42. If composite sampling is used, equal sample volumes are required. All samples taken shall be used in the analysis. The NMOC concentration from Method 25 or 25C shall be divided by 6 to convert from C-NMOC, as carbon to as hexane. 2) For landfills equipped with active collection systems, samples may be collected from the common header pipe before gas moving or condensate removal equipment; a minimum of 3 samples must be collected. [40 CFR 60.754(a)(3), (a)(5) and 62.14354]

Attachment E

Public Comments / District Response

PUBLIC COMMENTS / DISTRICT RESPONSE

No public comments were received.

Title V Facility Contacts

Created On (Date): 28 November 2001

For (Facility name): Kern County Waste Management—Shafter-Wasco Sanitary Landfill
(DBA ID Number): S-3431

By (District Staff Person): Douglas Shaffer

Based on Information Provided by: Initial Application Data

Responsible Official

Name: Daphne Washington
Title: Director, Waste Management
Telephone: (661) 862-8900
Address: Kern County Waste Management Department
2700 "M" Street, Suite 500
Bakersfield, CA 93301

Contacts for Questions Regarding Application

Name: Tim Reed
Title: Engineer
Telephone: (661) 862 8855
FAX: (661) 862 8901

Send Draft Permits to:

Name: Tim Reed
Title: Engineer
Telephone: (661) 862 8855
FAX: (661) 862 8901
Address: Kern County Waste Management Department
2700 "M" Street, Suite 500
Bakersfield, CA 93301

Send Proposed and Final Permits to:

Name: Daphne Washington
Title: Director, Waste Management
Telephone: (661) 862-8900
FAX:
Address: Kern County Waste Management Department
2700 "M" Street, Suite 500
Bakersfield, CA 93301

Engineer Name	Douglas Shaffer
Engineer Initials	<Engineer's Initials>
Review Manager	Richard McVaigh
Facility's Regional Manager	Thomas Goff
Facility Name	County of Kern, Shafter-Wasco Sanitary Landfill
Facility #	S-3431
Project #	S-1010475
Operation Description	Municipal Solid Waste Landfill
Location	at 17621 Scofield Ave, near Shafter
	The following should make sense: This is for its Municipal Solid Waste Landfill at 17621 Scofield Ave, near Shafter, California.
Contact Receiving Final	Daphne Washington
Greeting Name	Ms. Washington
Mailing Address	Waste Management Department 2700 "M" Street, Suite 500 Bakersfield, CA 93301
Newspaper	Bakersfield Californian
Did EPA have objections?	No
Were there any comments?	Yes
Preliminary Notice Date	March 28, 2002

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit
District Facility # S-3431
Project # S-1010475**

Dear Mr. Rios:

The District has issued the Final Title V Permit for County of Kern, Shafter-Wasco Sanitary Landfill. The preliminary decision for this project was made on March 28, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
2020 L St.
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit
District Facility # S-3431
Project # S-1010475**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for County of Kern, Shafter-Wasco Sanitary Landfill. The preliminary decision for this project was made on March 28, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Sayed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Daphne Washington
County of Kern, Shafter-Wasco Sanitary Landfill
Waste Management Department
2700 "M" Street, Suite 500
Bakersfield, CA 93301

**Re: Notice of Final Action - Title V Permit
District Facility # S-3431
Project # S-1010475**

Dear Ms. Washington:

The District has issued the Final Title V Permit for County of Kern, Shafter-Wasco Sanitary Landfill. The preliminary decision for this project was made on March 28, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT
NOTICE OF FINAL DECISION TO ISSUE
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to County of Kern, Shafter-Wasco Sanitary Landfill for its Municipal Solid Waste Landfill at 17621 Scofield Ave, near Shafter, California.

The District's analysis of the legal and factual basis for this proposed action, project #S-1010475, is available for public inspection at the District office at the address below. For additional information regarding this matter, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900, or contact Seyed Sadredin, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

TITLE V PUBLIC NOTICE CHECKLIST

FACILITY ID: S-3431 **PROJECT #:** S-1010475

✓ ✓
REQST. COMPL.

- ☐ ☐ Title V PRELIMINARY PUBLIC NOTICE
- ☐ ☐ Title V REVISED PROPOSED PUBLIC NOTICE
- ✓ ☐ Title V FINAL PUBLIC NOTICE
- ☐ ☐ Title V MODIFICATION PUBLIC NOTICE

ENCLOSED DOCUMENTS REQUIRE:

- ✓ ☐ Stamp current date on all letters and signature page of the evaluation.
- ✓ ☐ Send **FINAL** notice letters to CARB, EPA and applicant including the following attachments:
 - ✓ Engineering evaluation with attachments.
 - ✓ Public notice
- ✓ ☐ Send **FINAL** public notice for publication to: Bakersfield Californian.
- ✓ ☐ Send signed copies of all **FINAL** notice letters, engineering evaluation with attachments, and public notice to the following:
 - ✓ Douglas Shaffer, Permit Services Engineer
 - ✓ Thomas Goff, Permit Services Manager
- ✓ ☐ Enter "Mail Date" onto project record.
- ✓ ☐ Attach Compliance Assistance Bulletin "Title V Reporting Requirements" to the facility mailing.
- ✓ ☐ Email Chay Thao Engineering Evaluation.
- ☐ ☐ Other special instructions: _____

Date completed: July 22, 2002 By: Douglas Shaffer

San Joaquin Valley Air Pollution Control District

Final Engineering Evaluation

Facility # S-3431

County of Kern, Shafter-Wasco Sanitary Landfill

PREPARED BY:

Douglas Shaffer
Air Quality Engineer

REVIEWED BY:

Richard McVaigh
Permit Services Manager

APPROVED BY:

Sayed Sadredin
Director of Permit Services

FINAL DECISION DATE:
